

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

TWIN PINES MINERALS, LLC,

Plaintiff,

v.

U.S. ARMY CORPS OF ENGINEERS;
CHRISTINE E. WORMUTH, Secretary of
the Army; MICHAEL L. CONNOR,
Assistant Secretary of the Army (Civil
Works); LTG. SCOTT A. SPELLMON,
Chief of Engineers; BG. JASON E. KELLY,
Commander, South Atlantic Division; COL.
JOSEPH R. GEARY, Commander, Savannah
District,

Defendants.

Civil Action No: 5:22-cv-00036-LGW-BWC

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE**

Come now Plaintiff Twin Pines Minerals, LLC and the Federal Defendants (collectively the “Parties”) and move the Court to extend the deadline for the Federal Defendants to file their response to Plaintiff’s Motion for Preliminary Injunction for an additional 14 days until August 22, 2022. In support of this motion, the Parties state as follows:

1. On July 8, 2022, Plaintiff filed a Motion for Preliminary Injunction requesting that certain actions by the Assistant Secretary of the Army (Civil Works) and/or the U.S. Army Corps of Engineers be enjoined pending resolution on the merits. Doc. 19. Pursuant to Federal Rule of Civil Procedure 6 and Local Civil Rule 7.5, the Federal Defendants’ response to Plaintiff’s motion would have been due on Monday, July 25, 2022.

2. Pursuant to Local Civil Rule 6.1, the deadline for the Federal Defendants' response has been extended with Plaintiff's consent up to and including August 8, 2022. Docs. 21, 25.

3. To accommodate the scheduling needs of the Parties, and to allow for the orderly development of information that may be potentially relevant to the claims and issues in this case, the Parties request that the deadline for the Federal Defendants to file their response to Plaintiff's Motion for Preliminary Injunction be extended by an additional 14 days, up to and including Monday, August 22, 2022.

4. The Parties have consulted regarding the relief requested herein. All Parties represent that granting the requested extension will facilitate and potentially expedite the orderly resolution of this litigation.

5. As required by Local Civil Rule 7.1(b), a proposed order granting the relief requested is attached.

Respectfully submitted this 5th day of August, 2022,

JONES FORTUNA LP

/s/ John L. Fortuna

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¹ Pursuant to LCvR 83.4(c), the undersigned certifies that he is a member of at least one federal district court bar, and that he has read and is familiar with the local rules.

CERTIFICATE OF SERVICE

I hereby certify that on this date I filed the foregoing Joint Motion for Extension of Time with Clerk of Court using the Court's CM/ECF system, which will provide notice to all registered users.

/s/ John L. Fortuna

Counsel for Twin Pines Minerals, LLC